

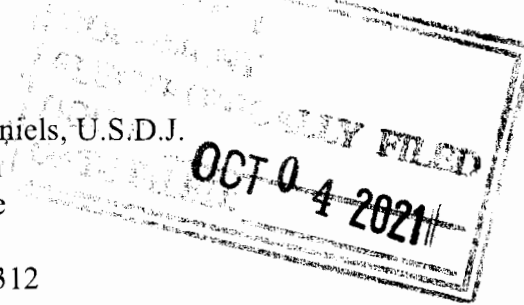


DEREK SMITH
LAW GROUP, PLLC
Employment Lawyers Representing Employees Exclusively

October 1, 2021

VIA ECF

Honorable George B. Daniels, U.S.D.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312



SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

OCT 04 2021

Re: Kristina Mikhaylova v. Bloomingdales, Inc., et al.
Docket No.: 19-cv-08927

Dated:

Dear Honorable District Court Judge Daniels:

As you are aware, this Firm represents Plaintiff, Kristina Mikhaylova, in the above-referenced action. This letter is submitted on consent of all parties. We write to Your Honor to respectfully request a fourth extension of discovery deadlines for the following reasons.

While the parties continue to work amicably to resolve outstanding document production issues in this matter, the undersigned is leaving the Derek Smith Law Group. As a result, this Firm is diligently working to assign a new attorney to the matter and bring them up to date on all the material facts. However, this Firm will need additional time to complete the transfer of the case; thereby, preventing the parties from completing depositions in accord with the current schedule. Additionally, with the upcoming holiday season, Defendant Bloomingdales' employees will have very limited availability; further necessitating the extension.

As a result of the foregoing, the parties respectfully request that the discovery deadlines be extended as follows:

1. Fact discovery, including all fact depositions, to be completed by January 31, 2022;
2. Expert discovery: affirmative experts' reports and Rule 26 affirmative expert disclosures to be served by February 28, 2022; responsive reports and responsive Rule 26 expert disclosures to be served by March 31, 2022; all expert depositions to be completed by April 29, 2022;
3. Dispositive motions to be served by May 31, 2022 with reply papers due in accordance with paragraph 3 of the Case Management Plan and Schedule (Docket No. 47);
4. The pretrial conference, currently scheduled for October 6, 2021, be adjourned to February 2, 2022, currently the date for the final pretrial conference; and
5. The final pretrial conference, to be adjourned from February 2, 2022 to a date convenient for the Court in June of 2022.

New York City Office: One Penn Plaza, Suite 4905, New York, NY 10119 | (212) 587-0760
Philadelphia Office: 1835 Market Street, Suite 2905, Philadelphia, PA 19103 | (215) 391-4790
Miami Office: 701 Brickell Avenue, Suite 1310, Miami, FL 33131 | (305) 946-1884
New Jersey Office: 73 Forest Lake Drive, West Milford, NJ 07421 | (973) 388-8625
Website: www.discriminationandsexualharassmentlawyers.com




DEREK SMITH
LAW GROUP, PLLC
Employment Lawyers Representing Employees Exclusively

We thank this Honorable Court for its consideration in this matter.

Respectfully submitted,

DEREK SMITH LAW GROUP, PLLC
Attorneys for Plaintiff

By: 
Zachary T. Tortora, Esq.
One Penn Plaza, Suite 4905
New York, New York 10119
(212) 587-0760

CC: **Via ECF**

Christopher Michael McFadden, Esq.
Steven Gerber, Esq.
SCHOEMAN UPDIKE & KAUFMAN & GERBER LLP

Betty Thorne Tierney, Esq.
MACY'S, INC. LAW DEPARTMENT

Attorneys for Defendants